

## DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY

5000 OVERLOOK AVENUE, S.W., WASHINGTON, D.C. 20032

March 16, 2005

Karen D. Johnson, Chief Safe Drinking Water Act Branch (3WP32) Office of Compliance and Enforcement Water Protection Division U.S. Environmental Protection Agency, Region III 1650 Arch Street Philadelphia, PA 19103

Dear Ms. Johnson:

Pursuant to paragraph 82 of US Environmental Protection Agency (EPA) – DC Water and Sewer Authority (WASA) Administrative Order (AO) Docket No. SDWA-03-2004-0259DS, WASA is required to replace 1,000 lead service lines identified by the prioritization plan between October 1, 2004 and September 30, 2006. In an effort to be as responsive as possible to the public concern, particularly with regard to children under age six and pregnant women in the District of Columbia, WASA initiated its priority lead services replacement program in our 2004 lead program year prior to the effective date of the AO.

To this end, WASA dedicated one of our 2004 contracts to the replacement of 500 priority addresses, with primary emphasis on daycare centers/homes and homes of children with high blood lead levels. In 2004, WASA began our program to replace the lead services of all addresses meeting these two criteria.

In addition, WASA invited customers to request priority replacement based on risk factors, namely children under the age of six and pregnant/nursing women. A letter of April 13, 2004, sent to every customer with a lead or unknown service line, included a priority replacement request form. Customers were invited to mail in this form, or their request for priority replacement could be made by phone by calling our Lead Service Hotline or the Department of Engineering and Technical Services.

Thus, in 2004, prior to the effective date of the AO, WASA replaced 282 lead services meeting the priority criteria as specified in the plan referenced in paragraph 81 of the AO. Accordingly, WASA is requesting that these 282 lead service replacements count toward the 1,000 priority replacements required per paragraph 82 of the AO.

Your prompt reply to this request would be greatly appreciated.

Sincerely,

John T. Dunn, P.E.

Chief Engineer/Deputy General Manager

cc: Avis Marie Russell General Counsel

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taker into account, already approved At 82 Oct 1 2004-Sept 30-2006